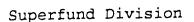


United States Environmental Protection Agency

⊕EPA

Region V 77 West Jackson Boulevard Chicago, Illinois 60604



Facsimile Cover Sheet Telephone Number . 312-353-8426



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	phone: 312-782-7781	Machine No: 312- 26	3-0939
VIIICE	Ditone, O		
Prom.	Craig Thomas		
F L OM:	30 881 -5007	Mail code: SRF-5J	
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Comment #24

will be used for VOC sample collection and preservation, consistent with IEPA FFU Administrative Procedures. <u>USEPA Response</u>: Please be advised that laboratory SOPs are required to be included with the project QAPP. The confusion arises when two separate QAPP documents, often with conflicting QA/QC criteria, are included and referenced. Please include the ARDL Laboratory SOPs.

Response: The ARDL Laboratory SOPs have been added to the table of contents as "Attachment A" and copies of the SOPs are provided for inclusion into the Project QAPP document.

28. SOP TPH Analysis. <u>US-EPA Response to USACE Draft QAPP Response</u>: Comment partially addressed. Has a MDL/PQL for Glycol analysis been established by the laboratory? If so, can these values be provided? <u>USACE Response</u>: The MDL/MRL for glycol has been added to Section 3.6.2. <u>USEPA Response</u>: Concur. Please include glycol values in the Target Compound List Tables Section of the document for clarity.

Response: Table 3-6 has been revised to include MDL and PQL values for glycol.

Table 3-1 8260B VOC TCL List Revisions. <u>US-EPA Response to USACE Draft QAPP Response</u>: There were extensive changes to this table without the utilization of redline/strikeout. Why are there now only approximately 33 analytes listed in the Draft Final FHI QAPP Table 3-1, when the same 8260 VOC table in the draft QAPP listed approximately 64 analytes? It appears that the ARDL QAPP Appendix D.2 VOC TAL-Contract Required Quant. Limits were substituted. This list is also considerably truncated from the analytes listed for the ARDL 8260 SOP. Why? <u>USACE Response</u>: The VOC analyte specifications in the FHI Project QAPP are the analytes to be tested for. The analytes contained in the ARDL SOP 8260B were a generic list containing all analytes that may potentially be analyzed. The CLP TCL will be analyzed for VOCs using Method 8260B. Table 3-1 has been revised accordingly. <u>USEPA Response</u>: Comment not addressed. US-EPA wishes clarification as to why the list of analytes has been reduced to this level. US-EPA did not specify, nor request that the SW-846 8260B list be replaced with the much truncated CLP listing. Please utilize the 8260B listing of compounds.

Response: Analytical methods to be used were agreed to by the BCT. Use of the TCL/TAL was requested from IEPA in an April 27, 2001 letter to Mr. Mark Buck, the Army BCT Chairman. The TCL/TAL are robust lists routinely used by USEPA for site assessment. The use of the TCL/TAL lists were required by USEPA and IEPA for sampling activities on the adjoining Air Force portion of the O'Hare military property. The project QAPP currently reflects the use of the TCL/TAL lists, as requested by IEPA and agreed to by the BCT. The Army believes that this scope is sufficient to assess the presence or absence of contamination at the site. Any changes in the current scope would require contract modifications, resulting in additional administrative and contract costs.

31. Table 3-2 8270C SVOC MDL/PQL Revisions. <u>US-EPA Response to USACE Draft</u>